

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

WINFRED MUCHIRA,

Plaintiff,

vs.

HALAH AL-RAWAF,  
IBRAHIM AL-RASHOUDI,  
FAHAD AL-RASHOUDI,  
LULUH AL-RASHOUDI,  
10686 Waterfalls Lane  
Vienna, VA 22182  
Fairfax County

Defendants.

Civil Action No. 1:14-cv-00770-AJT-  
JFA

**JURY TRIAL DEMANDED**

**NOTICE OF STIPULATION**

WHEREAS, the Court's Order dated November 7, 2014 (Dkt. No. 55) granted in part and denied in part Defendants' Motion to Compel (Dkt. No. 46);

WHEREAS, the Court ordered Plaintiff to serve a complete response to Interrogatory Number 11 on Defendants' counsel;

WHEREAS, Plaintiff served on Defendants' counsel an updated response to Interrogatory Number 11 on November 12, 2014 and December 3, 2014;

WHEREAS, the Court ordered Defendants' counsel not to disclose that information to Defendants and not to contact Plaintiff's current employer, either directly or indirectly, until further order of the Court;

WHEREAS, the Court ordered the parties to discuss a proposed stipulation that would resolve the need to serve discovery in this case on Plaintiff's current employer;

WHEREAS, the Court suggested possible language for this stipulation during the hearing on November 7, 2014;

NOW THEREFORE, Plaintiff and Defendants, through counsel, hereby stipulate that in the event no representative of Plaintiff's post-April 1, 2013 employers testify at trial, to the extent ruled admissible by the Court:

1. Between April 1, 2013 and July, 2013, Plaintiff occasionally performed odd jobs such as babysitting.

2. Plaintiff has been employed as a housekeeper from July 2013 through the present. She works between 20 to 40 hours per week.

3. Throughout Plaintiff's post-April 1, 2013 employment, she has been able to perform all her duties without impairment.

4. If Plaintiff's post-April 1, 2013 employers were called to testify, they would testify that during the time Plaintiff has worked for them, they have not observed any conduct by her that they associate with conditions or symptoms described in paragraphs 80-83 of the complaint.

DATED this 4th day of December, 2014      Respectfully submitted,

Plaintiff Winfred Muchira

By: /s/ Deborah A. Yates  
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*Counsel for Plaintiff*

and Defendants Halah Al-Rawaf, Ibrahim Al-Rashoudi,  
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**GOOD CAUSE HAVING BEEN SHOWN, IT IS SO ORDERED**

This \_\_\_\_\_ day of \_\_\_\_\_, 2014

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UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I certify that today, December 4, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notifications of the filing to each of the counsel listed in the foregoing pleading.

/s/ Deborah A. Yates

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